

**SPEARS & IMES LLP**

51 Madison Avenue  
New York, NY 10010  
tel 212-213-6996  
fax 212-213-0849

Joanna C. Hendon  
tel 212-213-6553  
jhendon@spearsimes.com

May 9, 2013

**BY FACSIMILE**

Honorable William H. Pauley, III  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse, 11D  
500 Pearl Street  
New York, NY 10007-1312

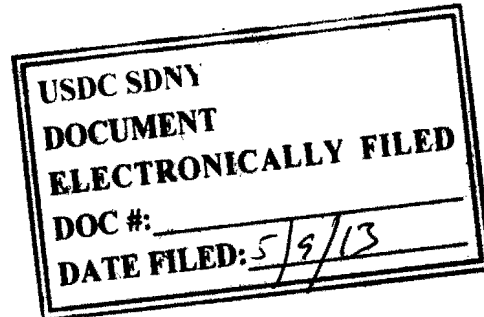
Re: *United States v. Freeman, et al.*, 12 Cr. 415 (WHP)

Dear Judge Pauley:

I represent the defendant Jermaine Lee in the above-captioned matter. Yesterday I filed on my client's behalf a sentencing brief using the ECF system. (The document bears ECF Document Number 69.) Pursuant to Your Honor's rules, courtesy copies of that submission will be delivered to Chambers.

I write to request permission to have the electronic copy of the sentencing submission filed last night expunged from the docket and to file in its place a redacted version. The reason for this request is that the unredacted submission details Mr. Lee's cooperation with the Government, including by quoting from the Government's letter to the Court on Mr. Lee's behalf, pursuant to U.S.S.G. § 5K1.1. Among other things, the submission discusses the strength of the Government's case against the co-defendants and the extent to which, according to the Government, Mr. Lee's cooperation likely factored into their decisions to plead guilty. Although Mr. Lee's co-defendants are incarcerated, I am concerned that the public disclosure of this material may create unnecessary risks for Mr. Lee and his family.

I have spoken to Andrew Goldstein, the responsible prosecutor. He advises that he has no objection to this request. If Your Honor is inclined to grant this request, direct the Clerk of the Court to expunge from the Docket the unredacted sentencing submission (ECF Document



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69), and authorize Mr. Lee to file a redacted version of the submission in its place, I respectfully ask that Your Honor memo endorse this letter below.


Respectfully submitted,



Joanna C. Hendon

cc: AUSA Andrew Goldstein (by e-mail)  
Vladimir Pavlovic, Esq.

SO ORDERED

  
WILLIAM H. PAULEY III  
U.S.D.J. 5/9/13